

## EXHIBIT AA

**REQUEST NO. 153:** Admit that you did not track when the TVT patient brochures were delivered to any individual physician's office.

**RESPONSE:**

Except as hereinafter expressly admitted, Defendants deny Request No. 153. Defendants admit that Ethicon did not maintain a centralized tracking system or database for this type of information and that no law or regulation requires that Ethicon maintain a centralized tracking system or database. The manner and means of monitoring the supply of patient brochures to surgeons' facilities fell under the purview of the individual sales representative.